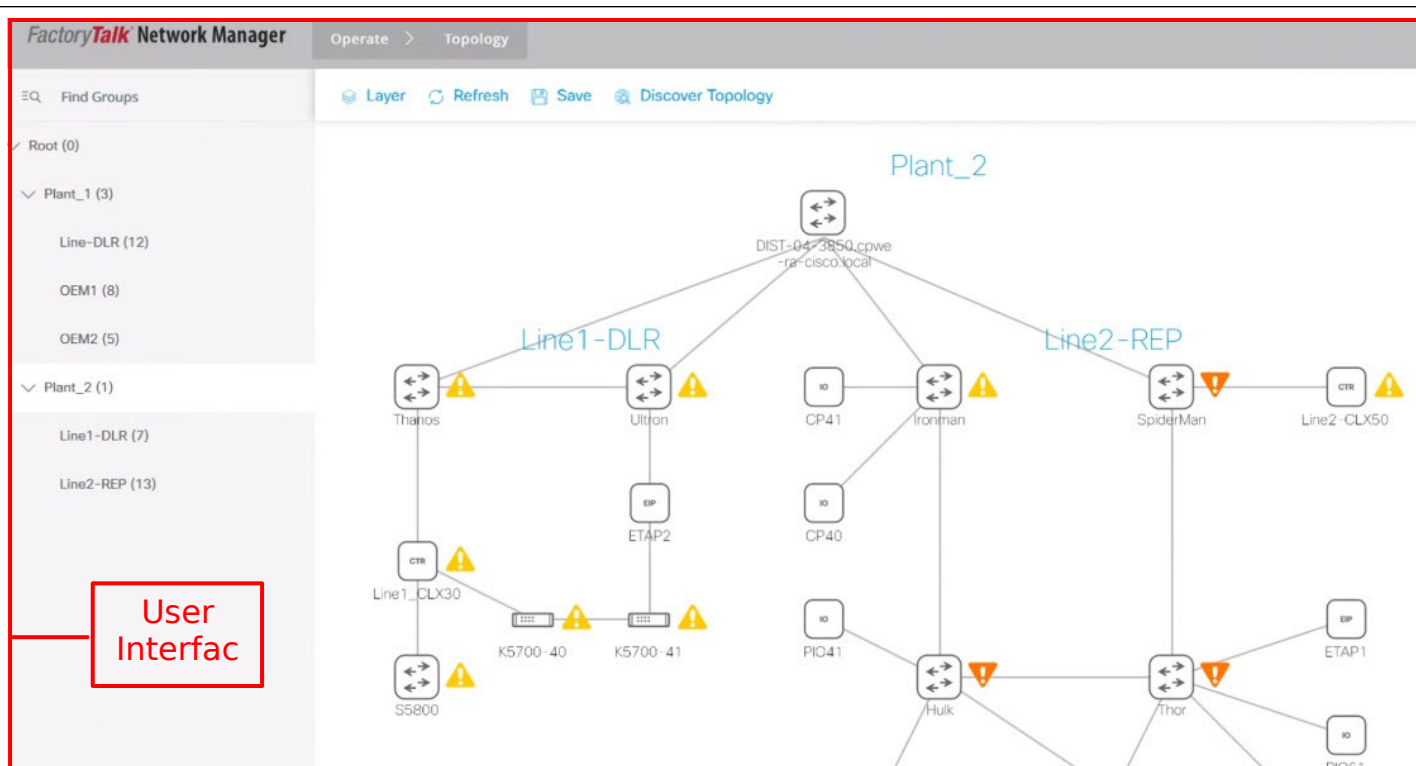


# Exhibit 2

**U.S. Patent No. 6,978,301 V. Rockwell Automation**

## 1. Claim Chart

Claim	Analysis
<p>[1.P] A method for communicating with a network device, the method comprising the steps of:</p>	<p>Rockwell Automation (“Defendant”) performs and/or induces others to perform a method for communicating with a network device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Defendant provides FactoryTalk Network Manager which monitors, configures, and troubleshoots the devices such as switches (“network device”) connected in a network. FactoryTalk Network Manager provides a user interface for an admin to implement device configurations for the devices connected to the network.</p> <p><b>Get a Better View of What is Happening in Your Facility</b></p> <p>FactoryTalk Network Manager software helps to achieve increased network visibility, easier troubleshooting, and simplified configuration and maintenance. Get insight into your network operations by getting a closer look at your devices connected in your manufacturing environment.</p> <p>Source: <a href="https://www.rockwellautomation.com/en-us/products/software/factorytalk/maintenancesuite/network-manager.html">https://www.rockwellautomation.com/en-us/products/software/factorytalk/maintenancesuite/network-manager.html</a></p>



Source: [https://www.youtube.com/watch?v=QeFxDecn8ZM&list=PL3K\\_BigUXJ1Mf-1cAfwMsHnrEwJGmFGZ&index=2](https://www.youtube.com/watch?v=QeFxDecn8ZM&list=PL3K_BigUXJ1Mf-1cAfwMsHnrEwJGmFGZ&index=2) (annotated)

## Easier Troubleshooting

Having the right tools that can collect diagnostic data from devices and generate reports that can be easily understood and analyzed is becoming more critical in automation networks. FactoryTalk Network Manager consolidates network status in a single place, increasing insight and greatly simplifying troubleshooting in fault conditions.

Source: <https://www.rockwellautomation.com/en-us/products/software/factorytalk/maintenancesuite/network-manager.html>

	<h2 style="text-align: center;">Simple Configuration and Maintenance</h2> <p>FactoryTalk Network Manager can help you simplify network maintenance and support, increasing productivity and reducing downtime. This software provides easy to use tools to archive, compare and restore switch configurations and performs firmware upgrades from a centralized location allowing for efficient management of network devices.</p> <p>Source: <a href="https://www.rockwellautomation.com/en-us/products/software/factorytalk/maintenancesuite/network-manager.html">https://www.rockwellautomation.com/en-us/products/software/factorytalk/maintenancesuite/network-manager.html</a></p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.1] receiving a network device identifier, the network device identifier corresponding to the network device;</p>	<p>Defendant performs and/or induces others to perform the step of receiving a network device identifier, the network device identifier corresponding to the network device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, FactoryTalk Network Manager receives the device information such as name and Product ID ("network device identifier") corresponding to a network device (such as a switch).</p>

FactoryTalk Network Manager Maintain > Software Images

< Back to Software Image Install Software Image

DEVICE FILTER > REVIEW DEVICES

Software Version 15.2(7)E2

Group Plant\_1 Tag(s) Enter or select tags

5 Devices(s)

Name	IP Address	State	Vendor	Product ID	Group	Software Version	Tags	Action
Line-SW2	10.17.62.12	Licensed	Rockwell Automation/Allen-Bradley	1783-BMS10CGP	Root > Plant_2 > Line-DLR	15.2(7)E1a	+	Upgrade
Line-SW3	10.17.62.13	Licensed	Rockwell Automation/Allen-Bradley	1783-BMS20CGP	Root > Plant_2 > Line-DLR	15.2(7)E1a	+	Upgrade
OEM1-5700	10.17.60.11	Licensed	Rockwell Automation/Allen-Bradley	1783-BMS06SGA	Root > Plant_2 > OEM1	15.2(7)E1a	+	Upgrade
OEM2-NAT	10.17.61.11	Licensed	Rockwell Automation/Allen-Bradley	1783-ZMS8T8E2TGN	Root > Plant_2 > OEM2	15.2(7)E1a	+	Upgrade
OEM2-SW12	10.17.61.12	Licensed	Rockwell Automation/Allen-Bradley	1783-ZMS4T4E2TGP	Root > Plant_2 > OEM2	15.2(7)E1a	+	Upgrade

Source: [https://www.youtube.com/watch?v=9wzmRvc0OWk&list=PL3K\\_BigUXJ1Mf-1cAfwwMsHnrEwjGmFGZ&index=7](https://www.youtube.com/watch?v=9wzmRvc0OWk&list=PL3K_BigUXJ1Mf-1cAfwwMsHnrEwjGmFGZ&index=7); at 0:37 (annotated)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

[1.2] retrieving a command-format	Defendant performs and/or induces others to perform the step of retrieving a command-format template from a repository containing a plurality of command-format
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<p>template from a repository containing a plurality of command-format templates, wherein the command-format template indicates how to construct a device-specific command for the network device and includes an attribute field;</p>	<p>templates, wherein the command-format template indicates how to construct a device-specific command for the network device and includes an attribute field.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, FactoryTalk Network Manager comprises a 'Plug and Play' feature which is used to provision and configure multiple network devices such as switches. The 'Plug and Play' feature uses configuration templates ("command format template") stored in FactoryTalk Network Manager servers ("repository") to create specific configurations for the particular network devices.</p> <p>Further, the configuration templates comprise variables ("attribute fields") such as SUBNET_MASK, GATEWAY, and NATIVE_VCLAN_ID which are updated according to the network device that is to be provisioned. Upon information and belief, the templates indicate how to construct device-specific commands based on the defined variables.</p>
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The screenshot displays the FactoryTalk Network Manager interface. At the top, there's a navigation bar with tabs for Design, Operate, Maintain, and Settings. Below this, a large light blue area contains a 'Plug and Play' button, which is highlighted with a red rectangle. The main header area shows 'FactoryTalk Network Manager' and a 'Dashboard' button. On the left, a 'Groups' sidebar lists a hierarchy: Root (0), Demo (6), Plant\_1 (2), Line-DLR (12), OEM1 (7), and OEM2 (11). The main content area is titled 'Dashboard for Group Root' and features an 'Alarms' section with 5 alarms. This section includes a list of affected devices categorized by severity: 0 CRITICAL, 1 MAJOR, and 4 MINOR. Below this is a bar chart titled 'Affected Devices' showing the count for each category: 0 for CRITICAL, 1 for MAJOR, and 4 for MINOR. A red rectangle highlights the text 'switches following a standard configuration template' overlaid on the bottom part of the dashboard. The source of the image is cited as a YouTube video.

Source: <https://www.youtube.com/watch?v=9wzmRvc0OWk&t=188s>, at 03:00

convenient method to apply standard configurations

Source: <https://www.youtube.com/watch?v=9wzmRvc0OWk&t=188s>, at 03:05

Inventory

Unassigned Devices

Profiles

Config Templates

Plug-and-Play DHCP Helper

Plug-and-Play DHCP Helper

The Plug-and-Play DHCP helper is useful for zero-touch commissioning new devices when external DHCP server, DNS server, or Cloud Redirect plug-and-play discovery options are not available. It enables users to have a fully self-contained plug-and-play solution on a portable system such as a laptop, in environments where lack of connectivity to IT infrastructure does not allow for external plug-and-play discovery mechanisms. The DHCP helper supports temporary DHCP IP address assignment only to directly attached or Layer-2 reachable devices so they can discover this plug-and-play server. This feature does not support DHCP Relays, and will only assign an address to DHCP requests generated by plug-and-play agents.

**Instructions**

1. Assign static IP address 192.168.200.1/24 to a wired port on the PC.
2. Connect the PC wired port to a staging switch. The staging switch can be any switch that passes traffic between the PC and the PnP switches being commissioned.
3. Connect the PnP switches to the staging switch.
4. Power on all the PnP switches. If not new out of the box, reset the switches to factory default settings by depressing the express setup button as described in the hardware installation guide.
5. Enable the DHCP helper by toggling the switch below.

Disabled ☐ Enabled ☒

PnP-Switch 1   PnP-Switch 2   ...   PnP-Switch n

centralized factory talk  
network manager server

Source: <https://www.youtube.com/watch?v=9wzmRvc0OWk&t=188s>, at 03:19

Name\*

OEM1-5700-site1

Configuration Template\*

OEM-5700

Don't see the template you need? [Upload a new template](#)

Device Authentication

Apply Configuration Template to

☐ Pre-configure device before commissioning

☐ Execute commands on device before commissioning

☒ Upgrade device software

You can select upto 3 software images of different device types to be applied to the devices in the PnP Profile

s5700-universalk9-tar.152-7.E2.tar x

Don't see the image you need? [Upload a new software image](#)

Disable Enable

Startup Configuration Running Configuration

Source: <https://www.youtube.com/watch?v=9wzmRvc0OWk&t=188s>, at 03:41

FactoryTalk Network Manager

Design > Plug and Play

< Back to PnP Profiles

Edit PnP Profile

Duplicate this PnP Profile

ATTRIBUTES DEVICES TEMPLATE VALUES PREVIEW

Template Content

```
!
service nagle
no service pad
service tcp-keepalives-in
service tcp-keepalives-out
service timestamps debug datetime msec localtime show-timezone
service timestamps log datetime msec localtime show-timezone
service password-encryption
service unsupported-transceiver
hostname ${HOSTNAME}
boot-start-marker
boot-end-marker
!
logging buffered 16384
no logging console
enable secret 0 $(PWD_ENABLE)
!
username ${USER_ADMIN} privilege 15 secret 0 $(PWD_ADMIN)
aaa new-model
!
```

SUBNET\_MASK

Value \*

255 255 255 0

Range

GATEWAY

Value \*

10.17.60.1

Range

NATIVE\_VLAN\_ID

Value \*

999

Range

USER\_ADMIN

Value \*

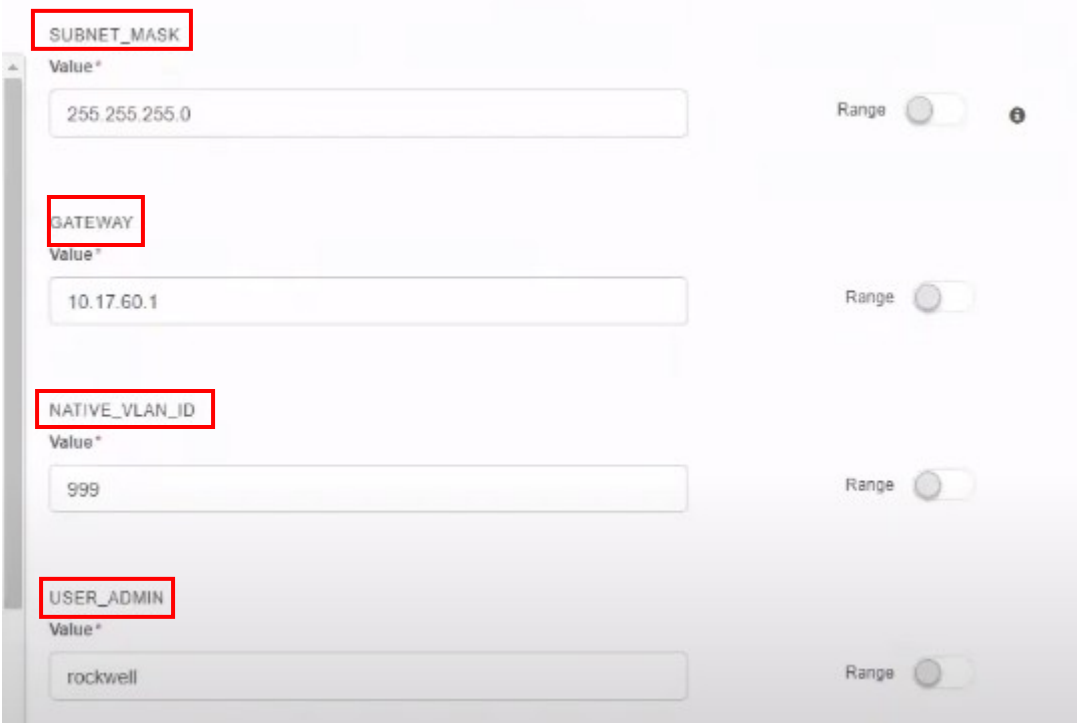
rockwell

Range

the template can include variables such as device names

Attribute

Source: <https://www.youtube.com/watch?v=9wzmRvc0OWk&t=188s>, at 03:51

	 <p>Source: <a href="https://www.youtube.com/watch?v=9wzmRvc0OWk&amp;t=188s">https://www.youtube.com/watch?v=9wzmRvc0OWk&amp;t=188s</a>, at 03:51</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[1.3] identifying attribute data corresponding to the attribute field;	<p>Defendant performs and/or induces others to perform the step of identifying attribute data corresponding to the attribute field.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, FactoryTalk Network Manager determines the values ("attribute data") defined for the particular variable fields in the configuration template.</p>

FactoryTalk Network Manager Design > Plug and Play

Back to PnP Profiles Edit PnP Profile Duplicate this PnP Profile

ATTRIBUTES DEVICES TEMPLATE VALUES PREVIEW

Template Content

```
!
service nagle
no service pad
service tcp-keepalives-in
service tcp-keepalives-out
service timestamps debug datetime msec localtime show-timezone
service timestamps log datetime msec localtime show-timezone
service password-encryption
service unsupported-transceiver
hostname ${HOSTNAME}
boot-start-marker
boot-end-marker
!
logging buffered 16384
no logging console
enable secret 0 ${PWD_ENABLE}
!
username ${USER_ADMIN} privilege 15 secret 0 ${PWD_ADMIN}
aaa new-model
!
```

SUBNET\_MASK  
Value\*  
255.255.255.0  
Range

GATEWAY  
Value\*  
10.17.60.1  
Range

NATIVE\_VLAN\_ID  
Value\*  
999  
Range

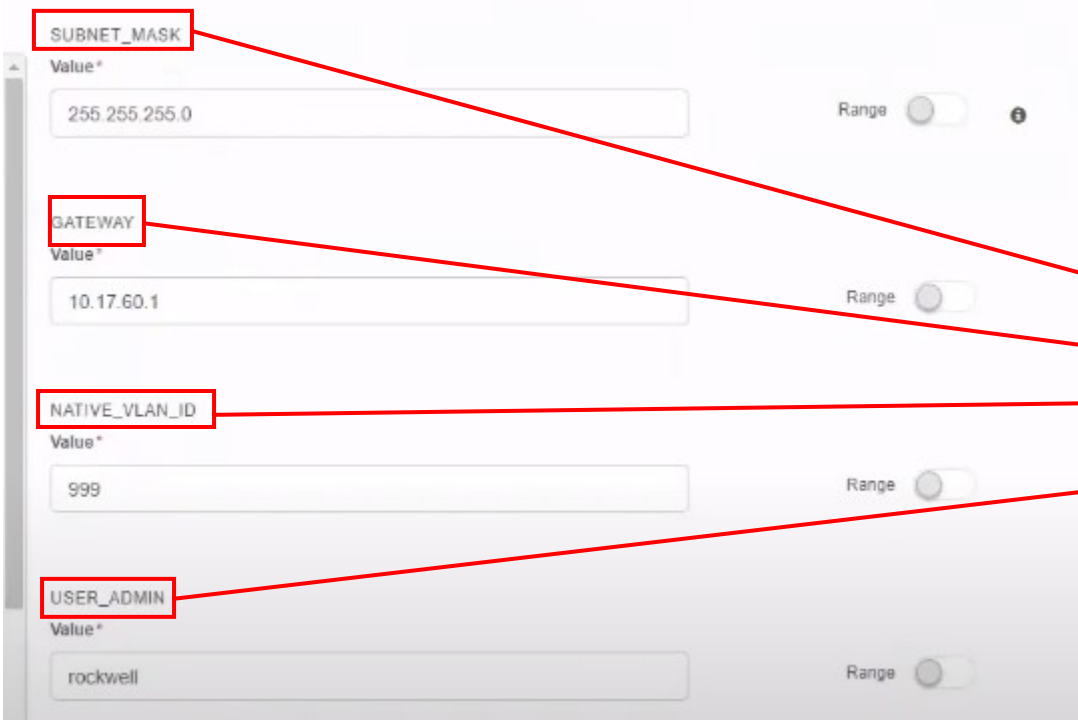
USER\_ADMIN  
Value\*  
rockwell  
Range

Attribute

Attributes

the template can include variables such as device names

Source: <https://www.youtube.com/watch?v=9wzmRvc0OWk&t=188s>, at 03:51

	 <p>Source: <a href="https://www.youtube.com/watch?v=9wzmRvc0OWk&amp;t=188s">https://www.youtube.com/watch?v=9wzmRvc0OWk&amp;t=188s</a>, at 03:51</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.4] generating the device-specific command for the network device using the retrieved command-format template and the identified attribute</p>	<p>Defendant performs and induces others to perform the step of generating the device-specific command for the network device using the retrieved command-format template and the identified attribute data.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, upon information and belief, FactoryTalk Network Manager generates</p>



data; and

device-specific commands that are based on the variables in the configuration template such that the specific configuration is provisioned to the network device.



Source: <https://www.youtube.com/watch?v=54-VofXa5hg>, at 01:09

FactoryTalk Network Manager

Design > Plug and Play

< Back to PnP Profiles

Edit PnP Profile

Duplicate this PnP Profile

ATTRIBUTES DEVICES TEMPLATE VALUES PREVIEW

Template Content

```
!
service nagle
no service pad
service tcp-keepalives-in
service tcp-keepalives-out
service timestamps debug datetime msec localtime show-timezone
service timestamps log datetime msec localtime show-timezone
service password-encryption
service unsupported-transceiver
hostname ${HOSTNAME}
boot-start-marker
boot-end-marker
!
logging buffered 16384
no logging console
enable secret 0 $(PWD_ENABLE)
!
username $(USER_ADMIN) privilege 15 secret 0 $(PWD_ADMIN)
aaa new-model
!
```

Attribute

Attributes

the template can include variables such as device names

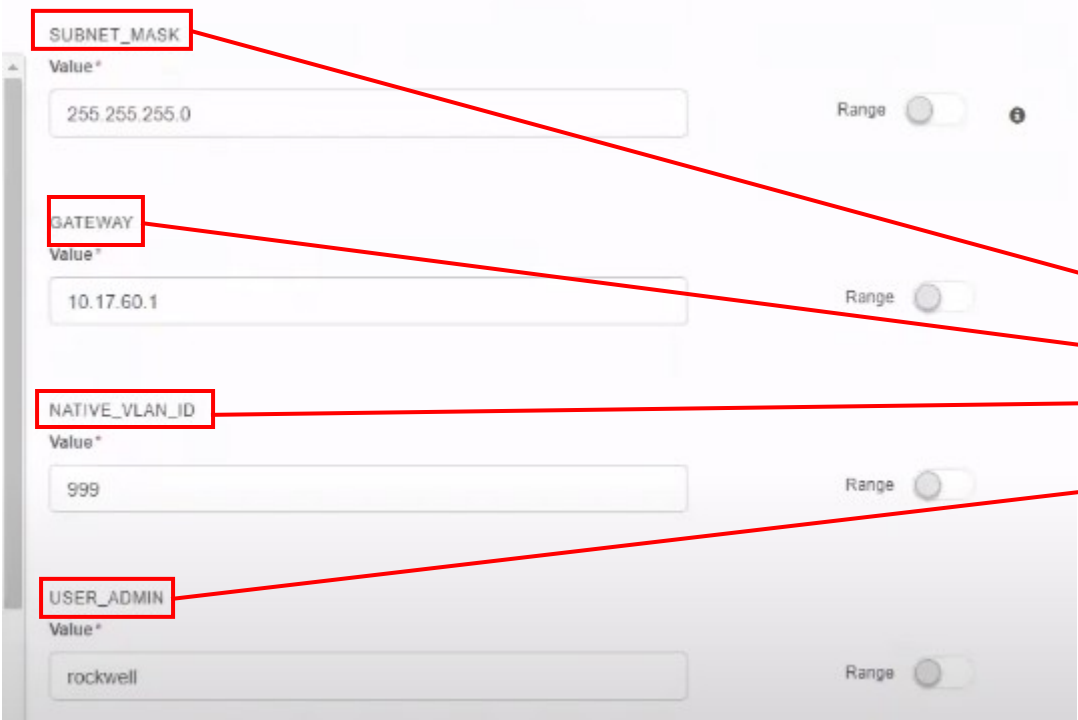
SUBNET\_MASK  
Value\*  
255.255.255.0  
Range

GATEWAY  
Value\*  
10.17.60.1  
Range

NATIVE\_VLAN\_ID  
Value\*  
999  
Range

USER\_ADMIN  
Value\*  
rockwell  
Range

Source: <https://www.youtube.com/watch?v=9wzmRvc0OWk&t=188s>, at 03:51

	 <p>Source: <a href="https://www.youtube.com/watch?v=9wzmRvc0OWk&amp;t=188s">https://www.youtube.com/watch?v=9wzmRvc0OWk&amp;t=188s</a>, at 03:51</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[1.5] providing the generated device-specific command to the network device.	<p>Defendant performs and induces others to perform the step of providing the generated device-specific command to the network device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, FactoryTalk Manager sends the generated device-specific commands in the specific configurations to the particular network device.</p>



Source: <https://www.youtube.com/watch?v=54-VofXa5hg>, at 01:09

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

## 2. List of References

1. <https://www.rockwellautomation.com/en-us/products/software/factorytalk/maintenancesuite/network-manager.html>, last accessed on June 14, 2023.
2. [https://www.youtube.com/watch?v=QeFxDecn8ZM&list=PL3K\\_BigUXJ1Mf-1cAfwwMsHnrEwJGmFGZ&index=2](https://www.youtube.com/watch?v=QeFxDecn8ZM&list=PL3K_BigUXJ1Mf-1cAfwwMsHnrEwJGmFGZ&index=2), last accessed on June 14, 2023.
3. [https://literature.rockwellautomation.com/idc/groups/literature/documents/pp/ftalk-pp024\\_-en-p.pdf](https://literature.rockwellautomation.com/idc/groups/literature/documents/pp/ftalk-pp024_-en-p.pdf), last accessed on June 14, 2023.
4. [https://www.youtube.com/watch?v=9wzmRvc0OWk&list=PL3K\\_BigUXJ1Mf-1cAfwwMsHnrEwJGmFGZ&index=8](https://www.youtube.com/watch?v=9wzmRvc0OWk&list=PL3K_BigUXJ1Mf-1cAfwwMsHnrEwJGmFGZ&index=8), last accessed on June 14, 2023.